

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 25-20035-Cr-MORENO

UNITED STATES OF AMERICA

Plaintiff,

v.

KEINER CICILIA-RODRIGUEZ,  
Defendant.

/

**UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL  
AND ALL DEADLINES**

KEINER CICILIA-RODRIGUEZ, through undersigned counsel and pursuant to Rule 7.6 of the Local Rules of the Southern District of Florida, respectfully requests this court continue the currently scheduled trial until the May. Undersigned submits the following affidavit pursuant to the local rules.

1. Mr. Cicilia made his initial appearance in this matter on January 21, 2025, [DE 8], and was arraigned on February 11, 2025. [DE 35]. On February 13, 2025, this court entered an order setting the matter for trial during the two-week period beginning March 10, 2025. [DE 38].
2. The government produced the discovery on February 18, 20205 [DE 39] but counsel will have had fewer than 30 days to receive, reproduce, review, and discuss the discovery with her client.
3. In addition, undersigned counsel and counsel for the government has alerted the court that they seek authorization to take Rule 15 depositions of potential material witnesses before they are deported. Specifically, there were 25

undocumented aliens alleged to have been trafficked by the defendants. They were detained at the time of the defendant's arrest and most are still detained prior to their deportation. Obviously, the government cannot and should not detain them pending trial as such, counsel has sought to interview them to determine which testimony, if any, should be preserved for trial.<sup>1</sup>

4. The government and undersigned counsel have been working toward locating the aliens and arranging their interviews but would still require this court's authorization to depose them.

**SOUTHERN DISTRICT OF FLORIDA**  
**LOCAL RULE 88.9 NOTICE**

Counsel has conferred with all counsel in this case regarding this motion pursuant to Local Rule 88.9. Specifically, counsel spoke with Assistant United States Attorney Andres Chinchilla, Assistant Federal Defender Kathleen Taylor (counsel for Sedeno Rodriguez), Nayib Hassan (counsel for Villares) and none oppose this motion for continuance.

This motion is filed in good faith and without the intent to unduly prejudice either party. It respectfully submitted that it is in the interests of justice and

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<sup>1</sup> That motion was filed January 29, 2025, [DE 21], an amended motion was filed on February 7, 2025, [DE 33], and the government's response was filed February 10, 2025 [DE 34]. The motion has not been ruled on and the parties still seek to depose some of the undocumented aliens.

efficiency to grant a continuance of the presently scheduled motions and trial dates in this case.

WHEREFORE, Mr. Cicilia Rodriguez respectfully requests the trial in this matter be continued until May 2025.

RESPECTFULLY SUBMITTED

CELESTE SIBLESZ HIGGINS, ESQ.

/s/ Celeste Siblesz Higgins

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 21, 2025, undersigned electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Celeste S. Higgins